

EXHIBIT C
PROPOSED ORDER

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17 **UNITED STATES BANKRUPTCY COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

19 In re:

20 PG&E CORPORATION

21 - and -

22 PACIFIC GAS AND ELECTRIC
23 COMPANY,

24 Debtors.

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**[PROPOSED] ORDER GRANTING
SECURITIES PLAINTIFFS' MOTION TO
APPLY BANKRUPTCY RULE 7023 AND
CERTIFY A CLASS OF SECURITIES
CLAIMANTS**

1 Upon the motion, dated July 7, 2023,¹ of Claimant Public Employees Retirement
2 Association of New Mexico (“**Securities Lead Plaintiff**” or “**PERA**”), the court-appointed lead
3 plaintiff in the securities class action captioned as *In re PG&E Corporation Securities Litigation*,
4 Case No. 18-03509 (the “**Securities Action**”) pending in the U.S. District Court for the Northern
5 District of California (the “**District Court**”), on behalf of itself and the proposed class it represents
6 in the Securities Action (the “**Class**”), together with Claimants York County on behalf of the
7 County of York Retirement Fund, City of Warren Police and Fire Retirement System, and Mid-
8 Jersey Trucking Industry & Local No. 701 Pension Fund (collectively, the “**Securities Act**
9 **Plaintiffs**” and, together with Securities Lead Plaintiff, the “**Securities Plaintiffs**”), for entry of an
10 order, pursuant to Rules 7023 and 9014(a) and (c) of the Federal Rules of Bankruptcy Procedure
11 (the “**Bankruptcy Rules**”) certifying a class of securities claimants (the “**Motion**”); and this Court
12 having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§
13 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges,
14 General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and consideration of the
15 Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue
16 being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having
17 found and determined that notice of the Motion was reasonable and sufficient, and it appearing that
18 no other or further notice need be provided; and this Court having reviewed the Motion and held a
19 hearing to consider the Motion; and this Court having determined that the legal and factual bases set
20 forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief
21 requested in the Motion is appropriate under the circumstances; and upon the record of all of the
22 proceedings had on the Motion before this Court, and after due deliberation and sufficient cause
23 appearing therefor,

24 **IT IS HEREBY ORDERED THAT:**

- 25 1. The Motion is granted as set forth herein.
- 26 2. Pursuant to Federal Rule of Bankruptcy Procedure 9014, the Court hereby directs
27 that Federal Rule of Bankruptcy Procedure 7023 applies to the Securities Class Claims.

28 ¹ Capitalized terms used but not defined herein have the meanings given thereto in the Motion.

3. The factors enumerated in Federal Rule of Civil Procedure 23(a)(1)-(4) are satisfied;

4. Federal Rule of Civil Procedure 23(b)(3) is satisfied; and

5. The Court certifies a class consisting of all those who purchased or otherwise acquired the publicly traded debt or equity securities of PG&E Corporation, Pacific Gas and Electric Company, or both, from April 29, 2015 through November 15, 2018 (inclusive), and who timely submitted Securities Claims in these Chapter 11 Cases, which Securities Claims have not otherwise been resolved.

**** END OF ORDER ****

EXHIBIT A (TO PROPOSED ORDER)

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